

without prejudice to Applicant's right to pursue the subject matter of those claims in a divisional application.

Claims 1-3 were rejected under 35 U.S.C. §102(b) as being anticipated by the newly cited Hyatt patent. The Office Action alleges that the Hyatt patent discloses, at Figure 1 and in column 6, all of the subject matter set forth in the rejected claims. It is respectfully submitted, however, that the Hyatt patent neither anticipates nor otherwise suggests the subject matter of claims 1-3. In particular, the Hyatt patent does not disclose the use of a single active processor for controlling each of a data defining means and a data converting means, for receiving feedback information from a feedback device, and for controlling the operation of each of plural motors, as recited in the rejected claims.

As illustrated in Figure 1, the Hyatt patent is directed to a machine tool control system which includes a data processor 12. However, this data processor is not the only active processing element in the system. In addition to the data processor, the system includes three servos 20, 21 and 22 "for independent tool axis control" (column 5, lines 47-48). The data processor 12 performs only a portion of the overall control of the movement along each of the three axes. In particular, with reference to the description of Figure 3, the data processor sends each servo "a digital position signal 71 which indicates a commanded servo position" (column 15, lines 10-12). In response to receipt of this position signal, the individual servos carry out the remainder of the control function. In particular, as shown in Figure 3, the servos include comparator circuits 86 which produce square wave signals 87 that indicate the difference between the commanded position and the actual position, as detected by a resolver 78. See, for example, column 15, lines 29-

33. This square wave signal is sent to a digital to amplitude converter within the servo, which produces an error signal that is used in controlling the servo motor 99.

Thus, it can be appreciated that the Hyatt patent is similar to a number of other prior art systems that are discussed in the background portion of the application and elsewhere during prosecution. Unlike the subject matter recited in the rejected claims, the Hyatt system does not include a single active processor which performs each of the functions of controlling a data defining means, controlling a data converting means, receiving feedback information from each of the feedback devices, and controlling the operation of each of the motors to provide coordinated relative movement. Rather, these various functions are split among different active systems. It is the individual servos, rather than the data processor 12 of the Hyatt system for example, which perform the functions of receiving feedback information and controlling the operation of each of the motors. These servos are active processing devices in addition to the data processor 12. Accordingly, it is respectfully submitted that the Hyatt patent does not anticipate the subject matter of claims 1-3.

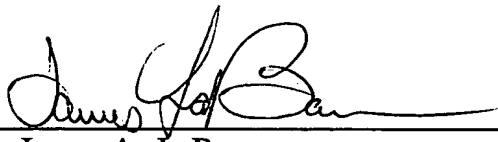
Claims 1-3 were also rejected under 35 U.S.C. §103 as being unpatentable over the Daggett patent in view of the Hyatt patent. This rejection is based upon an assumption that the Hyatt patent discloses a computer system architecture wherein a single active processor is used for multi-axis machine control. However, as pointed out above, the Hyatt patent does not disclose such an architecture. Rather, it utilizes multiple active devices to perform various control operations for the multiple axes. Accordingly, it is

respectfully submitted that the Daggett and Hyatt patents, whether considered individually or in combination, do not render the subject matter of claims 1-3 obvious.

Claims 18 and 19 were included with the rejection of claims 11-13, 15 and 20-23 as being anticipated by the Gutman et al patent. It is to be noted, however, that claims 18 and 19 depend from claims 3 and 1, respectively, and do not recite the type of subject matter for which the Gutman et al patent is being cited. Claim 18 is directed to the manner of operation of the data converting means, and claim 19 recites that the data defining means includes a user interface for communication with the single active processor. It is respectfully submitted that the subject matter of these claims, as they depend from their parent claims, is not suggested by the Gutman et al patent. Furthermore, claims 18 and 19 are submitted to be allowable over the Hyatt and Daggett patents, for the reasons given above with respect to claims 1-3.

It is respectfully submitted that all claims pending in the application are patentable over the prior art of record. Reconsideration and withdrawal of the rejections of claims 1-3, 18 and 19, and allowance of all pending claims are respectfully requested.

Respectfully submitted,

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